ORIGINAL

DEPARTMENT OF THE ARMY
OMAHA DISTRICT CORPS OF ENGINEERS
6014 U.S. POST OFFICE AND COURTHOUSE
OMAHA, NEBRASKA 68102

REPLY TO
ATTENTION OF

September 5, 1985

Environmental (SF) Branch

Mr. Roy Schrock
U.S. Environmental Protection Agency
Region III
841 Chestnut Street
Philadelphia, Pennsylvania 19106

Dear Mr. Schrock:

Enclosed are the Corps of Engineers, Missouri River Division, comments on the latest revision to the feasibility study for the Sand, Gravel and Stone Superfund Site in Elkton, Maryland.

If you have any questions, please contact Ms. Kathryn Schenk, Telephone: FTS 864-4868 or 402-221-4868.

Sincerely,

S. L. Carlock

S. L. Carlock, P.E.
Chief, Environmental (SF) Branch
Engineering Division

Enclosure

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☐ MRD
☒ Omaha District

CORPS OF ENGINEERS ENGINEERING REVIEW COMMENTS

TO:

PLANS & SPECIFICATIONS AND/OR DESIGN REPORT: ☒ PRELIM F.S. ☐ FINAL ☐ AS-ADV.

DESIGNED BY: ☒ AR ☐ DIST

PROJECT: Sand, Gravel & Stone Site

LOCATION OR BASE: Elkton, Maryland

INVITATION NO.:

BID OPENING DATE:

COMMENTS BY: R. Donovan

BRANCH OR SECTION: Geotech Br.

DATE: 4 September 1985

DRAWING NUMBER OR PARAGRAPH NUMBER	ITEM NUMBER	COMMENTS — SHEET 1 OF 1	PHONED TO: (Name/Date)
9.1.3	1.	State Design Basis for 2 foot thick clay cap.	
9.5	2.	Table 9-1-6 not included.	
10.4.1	3.	See comment 1.	
	4.	Table 9-1-3 retained clay, FML, & Soil additives for study. Only clay discussed in this RAA. What happened to FML & soil additives?	
	5.	Table 10-4-1 indicates 83,500 cy of soil needed for clay cap. Discuss availability of this quantity and construction time vs. FML.	
10.5.1	6.	Interceptor trenches consist of open sheet-piled excavations. Discuss whether the groundwater contaminant may corrode the sheetpile.	

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CORPS OF ENGINEERS
ENGINEERING REVIEW COMMENTS

TO:

PLANS & SPECIFICATIONS AND/OR DESIGN REPORT	DESIGNED BY:	PROJECT:
☒ PRELIM ☐ FINAL ☐ AS-ADV.	☒ AE ☐ DIST	Sand, Gravel and Stone

LOCATION OR BASE:	INVITATION NO.:	BID OPENING DATE:
Elkton, MD		Feasibility Study

COMMENTS BY:	BRANCH OR SECTION:	DATE:
Tomiann McDaniel	Geology Sec.	30 August 1985

DRAWING NUMBER OR PARAGRAPH NUMBER	ITEM NUMBER	COMMENTS — SHEET 1 OF 1	PHONED TO: (Name/Date)
	1.	Suggest that a pump test be run on the shallow aquifer to confirm the hydraulic conductivities obtained from the slug tests. No rate of pumpage from the trenches was given in the report. This will be necessary for the treatment plant design.	
	2.	Is there any reason to believe that water will not easily recharge through the ponds and swamp?	
	3.	The number of drums given is based on a number of assumptions. This number could easily be overrun or underrun and this should be kept in mind when determining bid items.	

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☐ MRD ☐ _____ District	CORPS OF ENGINEERS ENGINEERING REVIEW COMMENTS	TO: K. Schenk MRDED-E
PLANS & SPECIFICATIONS AND/OR DESIGN REPORT ☐ PRELIM ☐ FINAL ☐ AB-ADV.	DESIGNED BY: ☐ AE ☐ DIST	PROJECT: Sand, Gravel, & Stone, FS
LOCATION OR BASE: Elkton, MD	INVITATION NO.:	BID OPENING DATE:
COMMENTS BY: G. Shearer	BRANCH OR SECTION: MRDED-1	DATE: 8/30/85

DRAWING NUMBER OR PARAGRAPH NUMBER	ITEM NUMBER	COMMENTS — SHEET 2 OF 2	PHONED TO: (Name/Date)
Specific	1.	Description of Alternative D-1 (p. 10-42). The	
10.6.1.1		report states that "The RI data showed that grossly	
(For A/E)		contaminated soils did not descend beyond 3 to 4	
		feet below the surface." Only 6 samples were taken	
		below 3 feet which is an insufficient number of	
		samples to base that statement on. Also, the data	
		do not necessarily agree with that statement. For	
		example:	
		SAMPLE 6" 3' 4'	
		SBS-11 Acetone 670 2700 No sample	
		SBS-16 Acetone ND 580 500 µg/kg	
		There may be some spots where significant soil	
		contamination is present below 3 feet.	
9.5	2.	Table 9-1-6 is referred to at the top of the page	
(p. 9-42)		and Table 9-1-7 is referred to near the bottom of	
		the page. Both tables were present and numbered	
		9-1-6 and 9-1-7 in the preliminary Draft FS. The	
		tables should be renumbered 9-3-1 and 9-3-2 respec-	
0808		tively. Table 9-3-1 (formerly 9-1-6) is missing in	
		this final Draft FS. Table 9-3-1 in this final	
		Draft FS (formerly 9-1-7) would then have to be	
		numbered 9-3-2.	

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☐ MRD ☐ _____ District	CORPS OF ENGINEERS ENGINEERING REVIEW COMMENTS	TO: K. SCHENK MRDED-E
PLANS & SPECIFICATIONS AND/OR DESIGN REPORT ☐ PRELIM ☐ FINAL ☐ AS-ADV.	DESIGNED BY: ☐ AE ☐ DIST	PROJECT: Sand, Gravel, & Stone Feasibility Study
LOCATION OR BASE: Elkton, Cecil County, Maryland	INVITATION NO.:	BID OPENING DATE:
COMMENTS BY: J. Carroll	BRANCH OR SECTION: MRDED-L	DATE: 14 Aug 85

DRAWING NUMBER OR PARAGRAPH NUMBER	ITEM NUMBER	COMMENTS — SHEET 1 OF 1	PHONED TO: (Name/Date)
General		The monitoring phases of all alternatives evaluated appear adequate to identify gross changes in contaminant composition and extent of migration.	
Fig. 10-3-1 & Table 10-3-1		The figure shows Residential Well 10 and the Table list Residential Well 07. (Otherwise the two agree.) These should be made consistent.	
Alternative D-1		Excavation is anticipated to a depth of 3 feet (on pg. 10-37). While this may be an appropriate mean for cost estimation, for the remedial action itself a set of contaminant concentrations should be used as an action level. Then the work would not simply "approach the point of diminishing returns," but would reach the defined point of insufficient return. Since the action level used depends on projections of the leaching of residual contaminants and other potential pathways of exposure, these levels should be studied as part of the FS and not simply added in the ROD.	
Alternatives D-2, E		See comment under D-1.	

PRELIMINARY

☐ MRD ☐ _____ District	CORPS OF ENGINEERS ENGINEERING REVIEW COMMENTS	TO: Bruce Little HRDED-E
PLANS & SPECIFICATIONS AND/OR DESIGN REPORT ☐ PRELIM ☐ FINAL ☐ AS-ADV.	DESIGNED BY: ☐ AE ☐ DIST	PROJECT: Sand, Gravel and Stone Site RI
LOCATION OR BASE: Elkton, MD	INVITATION NO.:	BID OPENING DATE:
COMMENTS BY: G. Shearer	BRANCH OR SECTION: HRDED-L	DATE: 5/10/85

DRAWING NUMBER OR PARAGRAPH NUMBER	ITEM NUMBER	COMMENTS — SHEET 1 OF 3	PHONED TO: (Name/Date)
General	1.	There are three names which seem to be used inter-	
		changeably - Maryland Sand and Gravelstone Co.,	
		Maryland Sand, Gravel, and Stone Co., and Sand,	
		Gravel, and Stone Co. Is there any real difference	
		between them?	
	2.	Most of the maps are quite blurry and hard to read,	
		which made it difficult for us to ascertain where	
		samples were taken. The clearest one is Figure	
		4-4-8 (p. 4-63).	
	3.	This RI report lists only data from this project.	
		Data from earlier studies were not included as is	
		often done in RI reports at other sites. Data	
		from earlier studies would be helpful in analyzing	
		the site.	
	4.	Ponds 01 and 02 and the waste close by appears to	
		have the highest levels of organic contamination	
		by far (samples WS-12, SED-21, and SED-04). The	
		concentrations are very high, but the values cannot	
		be used with much confidence when so much of the	
		analysis data has been rejected. The data in	

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CORPS OF ENGINEERS
ENGINEERING REVIEW COMMENTS

TO: Bruce Little
NRDED-E

PLANS & SPECIFICATIONS AND/OR DESIGN REPORT
☐ PRELIM. ☐ FINAL ☐ AS-ADV.

DESIGNED BY: ☐ AE ☐ DIST

PROJECT: Sand, Gravel and Stone Site RI

LOCATION OF BASE: Elkton, MD

INVITATION NO.:

BID OPENING DATE:

COMMENTS BY: C. Shearer

BRANCH OR SECTION: NRDED-L

DATE: 5/10/85

DRAWING NUMBER OR PARAGRAPH NUMBER	ITEM NUMBER	COMMENTS — SHEET 2 OF 3	PHONED TO: (Name/Date)
		Table 5-2-3 (volatile organics in sediments) shows	
		an inadequate level of quality control. Seven	
		vials were broken before they ever got to the lab	
		for analysis, and the rest of the data has far too	
		many rejected values. Some of the other tables	
		have more rejected data than I would like to see,	
		but 5-2-3 is the worst.	
	5.	The waste samples were analyzed for the 8 RCRA	
		metals by EP Toxicity Test. The other samples	
		were analyzed for 10 of the priority pollutant	
		metals. Probably should have analyzed for the	
		13 priority pollutant metals.	
p. 4-41		First sentence mentions three bedrock boreholes.	
		However, only one is mentioned anywhere else.	
p. 4-71		"None of these stations detected VOC species . . .".	
		SNW-18 and SNW-19 are included in this statement.	
		However, Table 4-4-9 (p. 4-69) shows up to 12	
		volatile organics in these samples, including	
		chlorobenzene at 5,380 µg/L.	

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PLANS & SPECIFICATIONS AND/OR DESIGN REPORT ☐ PRELIM ☐ FINAL ☐ AE-ADV.	DESIGNED BY: ☐ AE ☐ DIST	PROJECT: Sand, Gravel and Stone Site RI
LOCATION OR BASE: Elkton, MD	INVITATION NO.:	BID OPENING DATE:
COMMENTS BY: C. Shearer	BRANCH OR SECTION: NRORD-L	DATE: 5/10/85

DRAWING NUMBER OR PARAGRAPH NUMBER	ITEM NUMBER	COMMENTS — SHEET 3 OF 3	PHONED TO: (Name/Date)
p. 5-5,5-7		The location of sample SW-30 is not marked on	
		Figure 5-1-4. The location of SW-36 on Figure	
		5-1-4 is marked on the wrong side of Old Elk Neck	
		Road.	
p. 5-8		(Next to last paragraph) Pond 03, not 01, was	
		monitored by Stations SW-05, -06, and -07.	
8-14, 8-15		Using TCLO, TD50, TDLO, etc. can be somewhat	
		confusing. TDLO, LDLO, etc. values could be due	
		to a lab animal that has a great deal of biological	
		variability compared to the average. TD50, LD50,	
		etc. values should be much more reproducible.	

MRD FORM 0491